

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA)
)
 v.) CRIMINAL NO. 04-10194-RCL
)
 ANTHONY BUCCI, et al.)

Government's Response to Defendant Muolo's Second Motion to Amend Pretrial Conditions

The United States of America, by and through Assistant United States Attorney John T. McNeil, respectfully submits this response to Defendant Francis Muolo's second motion to amend his conditions of pretrial release (Docket No. 103), in which he requests an opportunity to work at a family store while on home confinement. The government does not object to such an amendment provided: the defendant complies with the conditions set forth in his motion (at page 2); that the hours he is permitted out of his home to work are 8:45 a.m. to 5:15 p.m. (in accordance with the store hours set forth in the defendant's attachment); that while at work the defendant is supervised and in the presence of Francis L. Muolo, William J. Muolo, or Michael A. Muolo at all times; and that William J. Muolo and Michael A. Muolo file with this Court affidavits certifying that they have reviewed the terms of the defendant's pretrial release order (Docket No. 21), and that they will immediately report any violations of that order to the Pretrial Services officer.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

Date: March 2, 2005

By: /S/ John T. McNeil
JOHN T. MCNEIL
Assistant U.S. Attorney